

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
OSCAR ENRIQUE PARRA :  
KARI LYN PARRA :  
Debtor(s) :  
ALLY FINANCIAL INC. :  
Movant :  
OSCAR ENRIQUE PARRA :  
KARI LYN PARRA :  
Respondent(s) :

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted that debtors are behind; however they intend to cure the arrears in a reasonable time. They were affected by Covid and had medical issues.
7. The vehicle is insured and therefore this paragraph is denied.
8. The Debtors lack knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
9. Admitted.
10. Admitted that debtors are behind; however they intend to cure the arrears in a reasonable time. They were affected by Covid and had medical issues and therefore request time to cure.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron  
Kara K. Gendron, Esquire  
Attorney ID 87577  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101  
(717) 232-6650 TEL  
(717) 232-0477 FAX  
karagendron@gmail.com